

WILLIAM W. MANLOVE, OSB #891607
Senior Deputy City Attorney
william.manlove@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

MEGHAN OPBROEK, an individual,

Case No.: 3:22-cv-00610-JR

PLAINTIFF,

v.

CITY OF PORTLAND, a municipal corporation,
ZACHARY DOMKA in his individual capacity,
BRENT TAYLOR, in his individual capacity,
MARK DUARTE, in his individual capacity, and
ERIK KAMMERER in his individual capacity,

**SUPPLEMENTAL DECLARATION OF
WILLIAM W. MANLOVE IN SUPPORT
OF DEFENDANT CITY OF
PORTLAND'S PARTIAL MOTION TO
DISMISS**

DEFENDANTS.

I, William W. Manlove, declare as follows:

1. I am a Senior Deputy City Attorney currently assigned to this action. I represent Defendant City of Portland ("City") in the above-entitled matter.
2. Attached to this declaration as ***Exhibit 4*** is a true and correct copy of the Listing of Legislative Records relating to House Bill 1515.
3. Attached to this declaration as ***Exhibit 5*** is a true and correct copy of excerpts of House Bill 1515.

Page 1 – SUPPLEMENTAL DECLARATION OF WILLIAM W. MANLOVE

4. Attached to this declaration as ***Exhibit 6*** is a true and correct copy of excerpts of the March 10, 1969, HB House Judiciary Committee Meeting Minutes.

5. Attached to this declaration as ***Exhibit 7*** is a true and correct copy of the Explanation of House Bill 1515 and Comments on House Bill 1515 by Section, prepared by Joseph T. Henke.

6. Attached to this declaration as ***Exhibit 8*** is a true and correct copy of excerpts of March 14, 1969, HB 1515 House Judiciary Committee Meeting Minutes.

7. Attached to this declaration as ***Exhibit 9*** is a true and correct copy of the April 10, 1969 Proposed Amendments to House Bill 1515.

8. Attached to this declaration as ***Exhibit 10*** is a true and correct copy of the May 8, 1969 House Amendments to House Bill 1515 by Committee on Judiciary.

9. Attached to this declaration as ***Exhibit 11*** is a true and correct copy of May 1, 1969 correspondence to Joseph T. Henke regarding proposed amendments to House Bill 1515.

10. Attached to this declaration as ***Exhibit 12*** is a true and correct copy of excerpts of May 14, 1969, HB 1515 Senate Judiciary Committee Meeting Minutes.

11. Attached to this declaration as ***Exhibit 13*** is a true and correct copy of Chapter 38, Of the suppression of riots, from the Criminal Code of Oregon, enacted on October 19, 1864.

12. I make this declaration in support of Defendant City's Partial Motion to Dismiss.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: March 21, 2023.

/s/ William W. Manlove
William W. Manlove